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September 4, 2019

Via ECF

Senior Judge Frederic Block United States District Court Eastern District of New York 225 Cadman Plaza E. Brooklyn, NY 11201

> Re: *Hikind v. Ocasio-Cortez* 19-cv-3956 (FB) (CLP)

Your Honor:

We represent the Plaintiff, Dov Hikind, in the above-mentioned action. The parties are currently scheduled to have a pre-motion conference before Your Honor on September 5, 2019 at 3:00 P.M. We write to inform the Court of recent important developments relevant to the upcoming conference.

The Knight First Amendment Institute at Colombia University sent a letter, dated August 28, 2019, to Defendant and Defendant's counsel in support of Plaintiff's position. *See Exhibit A*. In direct response to said letter, Defendant responded herself, via Twitter. *See Exhibit B*.

Congresswoman Ocasio-Cortez's response is in direct contravention to her Counsel's letter submitted before this Court, dated August 14, 2019, as well as Defendant's Answer. In said Twitter response, Defendant explicitly states she has blocked twenty (20) accounts for "ongoing harassment". Moreover, Defendant did not dispute that the @AOC account is used for official purposes, nor did the Congresswoman dispute any other facts in this matter. Defendant's Counsel, in their August 14, 2019 letter to the Court, explicitately stated that there was no particular reason for the blocking of Plaintiff. *See Dkt. 11* at page 3.

Respectfully submitted,

Macob Z. Weinstein

CC: Defendant's Counsel (via ECF)